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20 UBER TECHNOLOGIES, INC., RASIER, LLC,
21 and RASIER-CA, LLC

22 **UNITED STATES DISTRICT COURT**
23 **NORTHERN DISTRICT OF CALIFORNIA**
24 **SAN FRANCISCO DIVISION**

25 IN RE: UBER TECHNOLOGIES, INC.,
26 PASSENGER SEXUAL ASSAULT
27 LITIGATION

Case No. 3:23-md-03084-CRB (LJC)

**DECLARATION OF CHRISTOPHER V.
COTTON IN SUPPORT OF
DEFENDANTS' REPLY IN SUPPORT OF
MOTION TO COMPEL COMPLIANCE
WITH COURT ORDER**

28 This Document Relates to:

J.H. v. Uber Technologies, Inc., et al., No.
3:25-cv-05342-CRB

R.L. v. Uber Technologies, Inc., et al., No.
3:25-cv-05515-CRB

A.E. v. Uber Technologies, Inc., et al., No.
3:25-cv-07668-CRB

Judge: Hon. Charles R. Breyer
Courtroom: 6 – 17th Floor

1 I, Christopher V. Cotton, declare as follows:

2 1. I am an attorney at Shook, Hardy & Bacon L.L.P., counsel of record for Defendants
3 Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (collectively, “Uber” or “Defendants”). I
4 offer this Declaration in the above-captioned matter in support of Uber’s Reply in Support of Uber’s
5 Motion to Compel Compliance with Court Order.

6 2. Attached as **Exhibit A** is a true and correct copy of the deposition transcript for the
7 scheduled deposition of Plaintiff A.E. in *A.E. v. Uber Technologies, Inc. et al.*, No. 3:25-cv-07668-
8 CRB.

9 3. Attached as **Exhibit B** is a true and correct copy of the deposition transcript for the
10 scheduled deposition of Plaintiff R.L. in *R.L. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-05515-
11 CRB.

12 I declare under penalty of perjury under the laws of the United States of America that the
13 foregoing is true and correct.

14 Dated: December 29, 2025

Respectfully submitted,

15
16
17 /s/ Christopher V. Cotton

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